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Pre-Closing Plaintiffs*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:
MOTORS LIQUIDATIONS COMPANY, et al.
f/k/a General Motors Corp., et al.

Debtors.

Chapter 11
Case No.: 09-50026 (MG)

(Jointly Administered)

**JOINDER BY ADDITIONAL IGNITION SWITCH PRE-CLOSING ACCIDENT
PLAINTIFFS TO WILMINGTON TRUST COMPANY, AS GUC TRUST
ADMINISTRATOR'S PRELIMINARY OBJECTION [Doc. 14448] and THE
ECONOMIC LOSS PLAINTIFF'S OBJECTION [Doc. 14447] TO GENERAL MOTORS
LLC'S MOTION PURSUANT TO SECTION 105(A) OF THE BANKRUTPCY CODE TO
(A) STAY PROCEEDINGS RELATING TO THE PROPOSED SETTLEMENT AND
(B) GRANTED RELATED RELIEF**

The Additional Ignition Switch Pre-Closing Accident Plaintiffs¹ (the “Movants”), by and through the undersigned counsel, hereby join in the arguments made in the Preliminary Objection of Wilmington Trust Company, as GUC Trust Administrator [ECF 14448] and the Economic Loss Plaintiff’s Objection [ECF 14447] to General Motors LLC’s Motion Pursuant to Section 105(a) of the Bankruptcy Code to (A) Stay Proceedings Relating to the Proposed Settlement and (B) Grant Related Relief [ECF 14431]. In support of this Joinder, Movants state as follows:

¹ The “Additional Ignition Switch Pre-Closing Accident Plaintiffs” identified on Exhibit “A” to the following motion and supplements: ECF, 14018, 14046, 14112, 14195 and 14346, which are hereby incorporated by reference as if set forth fully herein.

1. Movants are personal injury plaintiffs and parties to the Settlement Agreement.

Movants hereby join in the objections of the GUC Trust and the Economic Loss Plaintiffs with regard to motion filed by New GM to stay proceedings related to the Proposed Settlement.

2. Movants reserve their right to be heard at the hearing on the objection and on any of the grounds set forth in the above-referenced objections.²

WHEREFORE, Movants respectfully request that (i) the relief requested by New GM by denied in all respects, and (ii) they be granted such other and further relief as is just and proper.

Dated: March 4, 2019

Respectfully submitted,

ANDREWS MYERS, P.C.

/s/ Lisa M. Norman

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² ECT 14447 and 14448 are hereby incorporated by reference as if set forth fully herein.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent on **March 9, 2019** electronically to the registered participants identified on the Notice of Electronic Filing (NEF) and on those parties listed as "Notice Parties" under the Court's December 12, 2016 Order to Show Cause [ECF No. 13802], with paper copies served by first class mail postage prepaid on all Notice Parties for whom email addresses are unavailable.

/s/ Lisa M. Norman
LISA M. NORMAN